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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06-0375 SI
	)	(CR 01-0389 SI
Plaintiff,	)	CR 00-0306 SI)
	)	
v.	)	[PROPOSED] ORDER AND
	)	STIPULATION EXCLUDING TIME
JORGE ESTRADA,	)	FROM THE SPEEDY TRIAL ACT
	)	CALCULATION
Defendant.	)	(18 U.S.C. § 3161 (h)(8)(A))
	)	

The parties stipulate and agree, and the Court finds and holds, as follows:

1. The parties appeared on the instant matter May 24, 2006 for defendant's arraignment on the indictment before the Honorable Judge Elizabeth D. Laporte. On May 24, 2006, the matter was continued to June 2, 2006 for initial appearance in front of the Honorable Susan Illston.

2. On June 2, 2006, the parties appeared in front of the Honorable Susan Illston and the matter was continued to June 23, 2006 for status / trial setting.

3. On June 2, 2006, Assistant Federal Public Defender Elizabeth Falk, who represents the

defendant, requested an exclusion of time from June 2, 2006 to June 23, 2006, based on effective preparation of counsel. The parties moved that this same time period be excluded from the calculation of time under the Speedy Trial Act.

3. In light of the foregoing facts, the failure to grant the requested exclusion would unreasonably deny counsel for the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(A), (B)(iv). The ends of justice would be served by the Court excluding the proposed time period. These ends outweigh the best interest of the public and the defendant in a speedy trial. See id. § 3161(h)(8)(A).

4. For the reasons stated, the time period from June 2, 2006 through June 23, 2006 shall be excluded from the calculation of time under the Speedy Trial Act.

IT IS SO STIPULATED.

DATED: \_\_\_\_\_

Respectfully Submitted,


/S/  
\_\_\_\_\_  
NAHLA RAJAN  
Special Assistant United States Attorney

DATED: \_\_\_\_\_

/S/  
\_\_\_\_\_  
ELIZABETH M. FALK  
Counsel for Jorge Estrada

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

  
\_\_\_\_\_  
HONORABLE SUSAN ILLSTON  
United States District Judge